



### **Upper Missouri River Reservoir Plan Public Comments**

The department collected public comment on the draft Upper Missouri River Reservoir Fisheries Management Plan from October 17 to November 17, 2019. Comments could be submitted to the department via the FWP website, email, U.S. Mail, or on forms provided at FWP hosted open houses. FWP received comments from 37 individuals, some of which represented organized fishing organizations. All comments were reviewed by the department and sorted into general topic categories. All comments received by the department are presented unedited below. The department's response to comments can be found in Appendix E of the Management Plan.

**Roberts, Eric**

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**From:** 4065474159@mms.att.net  
**Sent:** Saturday, November 16, 2019 6:13 PM  
**To:** Strainer, Adam  
**Subject:** [EXTERNAL]

adam i am from white sulphur springs and fish canyon ferry . i fished 2 tournaments and the quality of mid sized walleye [15\_19] was pathetic. during the broadwater tournament the mininum was 13 in and several teams didnt even catch a weighable fish. the canyon ferry festival in a 2 day tournament was won with 3 19\_20 fish first day with winner not catching a weighable fish 2nd day. this tournament brings some of the best fisherman in mt and like 30 teams didnt catch weighable fish in 2 days. Canyon Ferry needs some decent management.

Thanks Bob Rooney

## Roberts, Eric

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**From:** Bob Gilbert <elkbug@hotmail.com>  
**Sent:** Monday, November 04, 2019 2:28 PM  
**To:** FWP Fishing  
**Subject:** [EXTERNAL] Upper Missouri River Reservoir Management Plan

November 4, 2019

Montana Fish, Wildlife & Parks; Fisheries Section  
Montana Fish, Wildlife & Parks; Fish & Game Commission

Ref: Public Hearings on draft plan for the Upper Missouri River Reservoir Management Plan

Walleyes Unlimited of Montana is opposed to several portions of the above mentioned Plan. My reading of the proposed plan dealing with fish species on the river and lake system within the plan brings me to a conclusion which says, in effect, any failure to meet goals set for Trout, Perch, or forage species could, or would, lead to further suppression of Walleye in the system regardless of circumstances leading to those failures. Would factors leading to loss of spawning beds for Perch, on occasion, be grounds to further suppress Walleye? Would a 50 a day limit on Perch with no possession limit, which certainly could or would reduce Perch numbers, be caused by the mere presence of Walleye in the system? Would reduced stocking of trout caused by funding issues for the Department cause reduced population numbers by the mere presence of Walleye in certain waters within this Plan? There are a good many more concerns.

It's time to treat all game fish as such. Not to treat one species differently because some groups or folks don't care for them.

Now is not the time, nor is our charge, to point fingers. This Plan needs to address methods to improve game fishing in the State of Montana in a way which benefits all game species and gives Anglers the best opportunity to be successful fishers regardless of their particular species preference.

As part of a move to successful resolution of our concerns and still making this Plan work and be as flexible, as is truly necessary, let me suggest you listen to the testimony of Dale Gilbert and read, not look at, not glance at, but read, his written testimony and the suggestions offered to move all of us forward together. Dale has done a lot of research on this issue and his work deserves consideration.

Troy Warburton will also be offering his take on the Plan and offering some positive suggestions to make it work for all of Anglers and the fish species.

I am sure there will be quite a number of other WUM members and some non-members offering support for making some positive changes to the proposal.

I will be attending the November 12th hearing in Bozeman, weather permitting, to offer other comments in support of a final product which supports and sets up a method of managing the waters while treating game fish fairly and benefiting all Anglers who fish in Montana.

Thank you for your time and attention.

Bob Gilbert, Executive Director  
Walleyes Unlimited of Montana

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E-mail: elkbug@hotmail.com  
walleyesunlimited406@yahoo.com

## Roberts, Eric

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**From:** Buzz Helfert <buzzhelfert@gmail.com>  
**Sent:** Wednesday, November 06, 2019 10:13 AM  
**To:** FWP Fishing  
**Subject:** [EXTERNAL] upper missouri fishery

Greetings, My name is Buzz Helfert and I have been fishing the Missouri from Canyon Ferry to below Holter dam for 60yrs. Most of my fishing is the 1/2 mile below Canyon Ferry. For the last 5 yrs I have been fishing this stretch around 300 days per yr., and watched the trout fishing progressively decline. Mt fwp biologists explain that this decline is due to low water flows, low oxygenation of the water, and low spillover from CF reservoir. In 2011 I fished 116 days, and according to my fishing log I caught and released 670 trout in this same stretch. Every year the fishing gets worse. I used to catch 8-10 trout a day in oct-nov dec, but I haven't caught 5 fish in the last 2 months- they just aren't there. I no longer see spawning redds below CF in the spring like I used to. The trout fwp plant are short lived sterile hybrids. In the 70's and early 80's you planted Kamloop (along w/ other strains). These fish were long lived, successful spawners, and grew to 10 lbs. This stretch of river is the most accessible of the 3 dams and is heavily used. I would like you to consider some changes to your stocking program in this stretch of water. 1) Consider dropping the daily limit on trout to 3 fish. 2) Plant fish at Riverside campground to imprint fish in this stretch. 3) Plant Kamloop and other trout that reproduce. I know that Kamloop are aggressive predators, but all trout are predators and can be caught on crankbaits. Thanks for your consideration.

## Comments on UMRRMP Draft

While the majority of the plan as written has been very well done there are a few edits we feel need to be made to be more representative of what we have and eliminate some of what appears to contradict the working groups efforts and other parts of the plan.

The primary goal and effort of the working group was to simplify the plan and eliminate the absolute triggers and mandates as used in the past by establishing basic goals, and leaving the department the option of evaluating those goals and if not met, giving them the flexibility to take the best management action possible and identified as appropriate given whatever the scenario was at that time. Simply not wanting to limit the options and actions or try to guess today what the future holds – there are too many variables to deal with.

There were good parts to the plan like the PSD (Proportional Stocking Density) goals, the relative abundance goals, and the comments of working to improve forage and spawning habitat for trout and perch, as well as getting the trout stocking back on track.

However, as written some of the Draft plan comments continue to show the FWP will continue walleye suppression regardless of PSD and relative abundance goals for walleye and at any point any other goals are not met. This is not acceptable.

Other comments distort the actual scenario and what we are seeing and dealing with today in a negative way that is really not necessary.

We have identified critical issues that we request review, revision or deletion by priority as follows:

### Critical Change and Priority #1

Page 26 bullet 4. says in part **“Upon reaching the goal range targets listed above....more aggressive actions may be implemented”**...to consider actions that would further suppress walleye? If goals are reached, why do we need more aggressive management to further suppress walleye...including gill nets, spear fishing, eliminate or using tournaments, commercial harvest, and electrofishing. This type of comment just reinforces, FWP will do everything to eliminate walleye...even when goals are being met.

If the Department feels it is necessary to include reference to extreme measures in the event managing harvest limits does not work, and walleye relative abundance and conditions are outside the established goals maybe it is worth a comment.

If necessary we suggest the following edit to preface the additional aggressive management actions listed above.....“If relative abundance numbers for walleye are above established goals and/or relative weights and condition factors or growth rates fall below acceptable ranges after looking at trends and data, and adjustments to angler harvest limits has not worked, additional aggressive management and actions may be considered as follows.....

## Critical Change and Priority 2

Page 26, third bullet.....says "Additional aggressive management techniques may be implemented... if any of the following criteria is met.

1. When walleye density increases above prescribed relative abundance goals and/or there is a decrease below PSD goal ranges.
2. When yellow perch densities decrease below prescribed relative abundance goal ranges.
3. Rainbow trout density decreases below prescribed relative abundance goal ranges and walleye predation is determined to be the primary factor limiting rainbow trout recruitment.

The above should just be deleted as it limits alternatives and practically guarantees the Department will do nothing but continue to try and further suppress walleye numbers irregardless of their relative abundance and condition factors. To think the only option and way to improve PSD means, walleye numbers need to be even further suppressed is absolutely erroneous. That would only be justified where relative abundance exceeded the carrying capacity and relative weights or condition factors fall below acceptable ranges. Good management would include looking at all other options and then taking what appears to be the best course. The relative abundance goals established were based on what was felt was the acceptable carrying capacity ....which has been established at the 5-7 range, based on relative weights over the 25 years of history on CF.

Same issue with perch numbers falling below goal ranges. The perch goals were set somewhat high and have not been met or reached for years. This says if perch goals are being not met....we automatically, number 1 further suppress walleye irregardless of any other data. Data shows this is not justified.

We would suggest the entire bullet be deleted. It is not necessary. The point and effort of the working group was to eliminate these types of black and white scenarios, and establish basic goals and objectives to work towards and if they were not being met, to give the department the latitude to look at the situation and contributing factors to allow them the flexibility to take the most appropriate management action as justified. Without claiming their hands are tied because they have to follow the management plan as written!

## Critical Change and Priority #3

Page 26 fifth bullet says in part..... "If it is determined harvest is affecting walleye populations.....changes may be necessary". That is good.

However, in reading on further on Page 27 first two sub bullets that say in part .... Decreases to walleye limits will be considered .....if ... values decrease below relative abundance goals goal ranges and within PSD Goal ranges, perch and rainbow are **within or above relative** abundance goals and only after impacts to perch and rainbow are identified and evaluated.

Then it goes on and says...in part "Increases to walleye harvest limits will be considered ....when values increase above relative abundance goal ranges and/or fall below PSD goal ranges, yellow perch and/or rainbow trout abundance are below relative abundance goal ranges....

So they have very effectively included language in the plan that says they give priority to everything else and will take no action to implement changes in walleye limits unless perch and trout are at or above

goals irregardless of any other factors. Again this severely limits other alternatives and the opportunity to do what may be the best management action. The tie to perch and trout should be removed. The decision should be made on the relative abundance, condition factor and relative weight, and growth rates of the walleye which will take into consideration whether there is adequate forage or not.

It has been documented there are cycles with highs and lows with various forage species so keying in and only looking at one is not adequate. Walleyes like most other fish are opportunistic and will adapt and will utilize what forage is most available. What is critical is looking at the condition factor and relative weights and growth rates.

Both of these bullets should be deleted.

If this plan was implemented today as it is written.....the PSD goals are not even close to being met, the perch goals are not met nor are the trout goals being met. The only management action option listed is to increase walleye limits and further suppress the walleye that are left. Frankly, that is not acceptable. Walleyes in Canyon Ferry and Holter are down significantly and other options need to at least be considered before arbitrarily simply suppressing walleye numbers even further.

Edits should be made so a consistent message is conveyed. It has been well established that trout numbers are primarily affected by stocking levels, not walleye numbers. I would also have to say it is clear in seeing what has happened at Canyon Ferry and Holter that walleye are not the number one factor in the perch numbers as this entire document seems to project. It is not right.

#### **Critical Change and Priority #4**

Page 29 All Reservoirs .... Bullet 2 Says in part to “Consider active walleye management measures if primary forage fish species decrease significantly.” Because of typical cycles and trends of forage species this really should be revised and tied to overall condition factors and relative weights of walleye when they fall below acceptable ranges. This is the only true accurate measure of the adequacy of forage. So simply add..... “and relative weights and condition factors for walleye fall below acceptable ranges....typically established of 85%. Suggest adding ....”and condition factors and relative weights and growth rates of walleye fall below acceptable ranges.”

I believe we all understand and accept walleye numbers need to be kept in check so a healthy fishery can be sustained. We are not against that. But actions need to be taken based on the science and biology, and historical data we have not pressure from some special interest group or political lobby without supporting data.

Continuing with the same management philosophy that has been used for the past 25 years has not worked as well as hoped. They are giving trout and perch priority over walleye the same as they done for years...this plan provides specifics that absolutely contradict what it says the goals are in the introduction for managing a quality-multi species fishery with priority to trout and walleye and changes as requested are fully justified.

There are several other editorial changes we would like to see considered and made. Some of these would be simply technical corrections. Others would simply provide a much better picture and remove the “negative connotations” associated with them.



## Change and Requested edit #5

Page 20 par. 1 says walleye were stocked in Hauser Reservoir in 1951. We believe walleyes were stocked in Lake Helena in 1951. It probably is insignificant but would be more technically correct.

## Change and Requested edit #6

P 20, par. 3 needs some editing.

As currently written the plan says:

Walleye populations in Hauser and Helena Reservoirs were relatively stable in both size and abundance prior to the late 1990's when Canyon Ferry Reservoir population grew rapidly (Horn 2004). Since that time, walleye abundance throughout the system has increased substantially. Additionally, walleye have drastically reduced primary forage fish abundance such as perch and suckers, and thereby negatively affected walleye growth rates and size distribution. Walleye population **abundance throughout the system have all reached record high abundance levels** which typically coincided with historic low forage fish abundance.

A person simply needs to review the actual data on game fish populations pages A- 1, A-3, and A-5 to see that the generalizations and above comments are only partially but not 100% true. So why does it need to be said?

When you review actual data, the fact is over nearly the past three decades walleye numbers at Holter were very consistent with 2-4 fish per net with the exception of 1999, 2008 and 2009 and with a record high in 2013 and nearly record lows in 2017.

When you review the actual data, walleye numbers in Hauser were very low until 1998, but it is only fair to recognize walleyes were stocked by FWP from 1989 through the late 1990's.

When you look at the data, walleye abundance has not just "increased substantially throughout the system" as stated. In fact the numbers in Holter in 2017 were very low, with only three years in history being lower. And in fact as of this fall, walleye numbers are at record low numbers with 1.5 fish per net.

Also, the statement that suggests walleye size distribution and growth rates have been negatively affected is true in part.....but it is misleading because what is important is that the growth rates for walleye in Canyon Ferry are not below what would be considered normal. In fact the growth rates for walleye in Canyon Ferry are above every other fishery in the Montana, and above what would be considered average or normal growth rates across the Midwest. So why, are we suggesting current levels of walleyes are adversely affecting growth rates? This suggests an ongoing problem that no longer exists and is not supported by current data and should be deleted. Growth rates for walleye in Canyon Ferry may have been reduced from the initial years, but overall the growth rate and condition factors of walleye are above normal reviewing relative size distribution and relative weight charts today and when compared to other fisheries around the country. There is no evidence when walleyes are within the established abundance goal of 5-7 that they are stunted and suffering, to the contrary, their condition factors and growth rates are very good and above the norm.

So I believe it is justified to edit this paragraph and/or simply delete it.

If it is important to have some comments, then stick to what accurately portrays what we have and we would suggest the following language to replace the above:

“Over the past three decades walleye numbers in the mainstream reservoirs have fluctuated significantly with record highs at Holter in 2013, record highs in Hauser in 2017, and record highs in Canyon Ferry in 2018 and record lows in Holter in 2019. Prior to 2007 numbers in Holter were relatively stable with on average just over two, to just over 4 fish per net.

Years with record high levels of walleye have had negative impacts on forages and resulted in relative weights and condition factors for walleye clearly showing the carrying capacity of the system had been exceeded.

So it is important to recognize, walleye numbers need to be kept in check to sustain a healthy fishery. The relative abundance goals established in the plan for each species, the PSD goals for walleye along with condition factors and relative weights and growth rates need to be evaluated to determine appropriate levels of harvest needed to sustain a quality-multi species fishery.

Management efforts through changing angler harvest limits has very successfully suppressed walleye numbers in both Canyon Ferry and Holter. Other options may need to be considered for Hauser.

#### **Change and Requested Edit # 7**

P 20, par. 3 also says in part “Walleye population abundance throughout the system have all reached record high abundance levels which typically coincided with historic low forage fish abundance.

This comment again misrepresents the overall situation as it is and sends a very negative slant to what the current situation is and should be deleted. Or if a comment is needed we would suggest;

“We have seen record highs and record lows....for both walleye and perch.”

Note: in some cases record low perch numbers correspond to record low walleye....looking at Canyon Ferry in 2004, or looking at years with higher numbers of both perch and walleye for both CF and Holter. There is not the absolute direct correlation that high walleye absolutely means lower perch. In fact the highest level of perch ever recorded at Holter was the same year the walleye numbers were at record highs.” “The primary factor influencing perch is the lack of spawning habitat and cover.”

Simply review Appendix A page A-5 that shows walleye numbers in Holter in 2017 being relatively low...in fact there were only three years in history where the numbers were lower. This point was made at the Advisory Committee meetings and evidence is there to support it. So if walleye abundance goals are being met, and perch or trout drop, the answer is NOT to automatically further suppress the walleye, irregardless of abundance and condition factors being considered.

### **Change and Request edit # 8**

P. 21 first bullet says in part...."predation by walleye further reduces recruitment of successfully reared fish."

I guess I have to wonder how significant this really is to include in the plan. I understand that prior to changing the stocking plan to stock 7" trout this was an issue. But subsequent to that, I have a hard time buying all the 13" walleye are reducing the trout. I thought it had been pretty well accepted and documented trout numbers are related primarily to the stocking levels and walleyes currently had minimal if any measurable impacts.

To not continue to try to alienate and create friction between trout and walleye anglers....I don't think that statement is needed in the plan or if so without further clarification.

### **Change and Request Edit #9**

P 24, bullet 1 under All Reservoirs says...."Continue conservative harvest regulations to minimize impacts by anglers and mitigate ...predation." This is in the section dealing with perch. So is the 50 fish limit, with no possession the "conservative limit, they want to continue on Holter. We absolutely should be considering conservative limits, but this suggests they believe that already are and this is not acceptable.

Maybe the "continue" needs to be changed to "consider".....there is a significant difference in meaning.

The significant reduction of perch numbers in Holter generated a lot of discussion and public perception is that the liberal 50 fish daily, no possession limit is part of the problem. So it seems reasonable to at least consider limits that could help sustain the fishery.

### **Request for Clarification....possible edit # 10**

P 25, first bullet under All Reservoirs says in part--- Regulation Changes will first be dependent on walleye abundance and size structure but it goes on and says "relative to goal ranges for walleye, other fish and forage availability".

So what does it really mean? I actually believe this needs some editing....we believe changes should only be made after considering relative abundance and PSD goals for walleye along with relative weights and condition factors and growth rates. Period. Those things will address the issue and adequacy of forage will be reflected in those numbers.... Again specific ties to goal ranges for every other species should not be the determining criteria. We typically will see fluctuations and cycles with other fish and forages, when one goes up, one goes down...historical data confirms this, but if you say you can only consider changes for walleye when all other goals are met, you are practically stating you will never change walleye limits. What matters is whether the fish are healthy or not.

We believe the edits and requests for changes are critical to being able to have a good management plan that gives good direction but not not overly restrict options and best management practices.

Thank you for your time and consideration

# APPENDIX A

## Reservoir Fish Population and Angling Trends

Canyon Ferry Reservoir – Principle game fish population trends

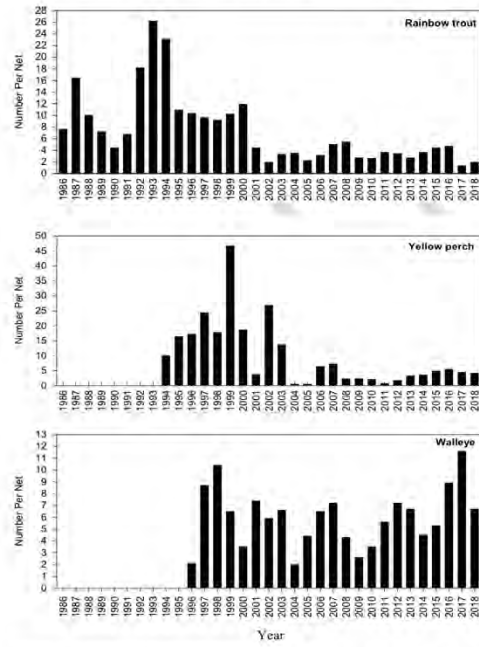


Figure 3. Canyon Ferry Reservoir Fish Population Trends for Rainbow Trout, Yellow Perch, and Walleye from Standardized Gill Netting Series.

# APPENDIX A

## Hauser Reservoir - Principle game fish population trends

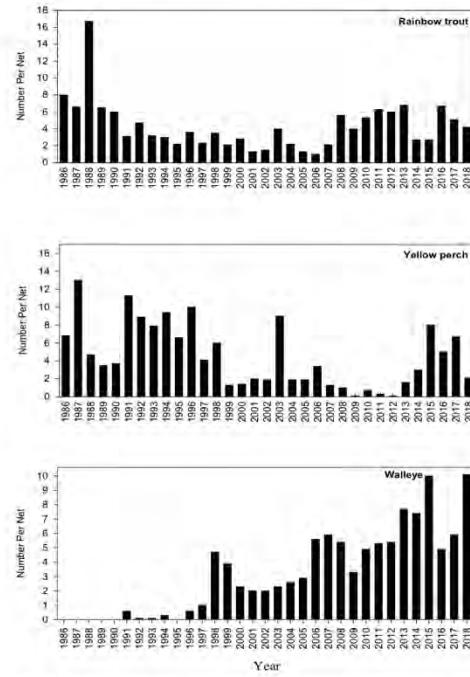


Figure 5. Hauser Reservoir Fish Population Trends for Rainbow Trout, Yellow Perch, and Walleye from Standardized Gill Netting Series.

# APPENDIX A

## Holter Reservoir – Principle game fish population trends

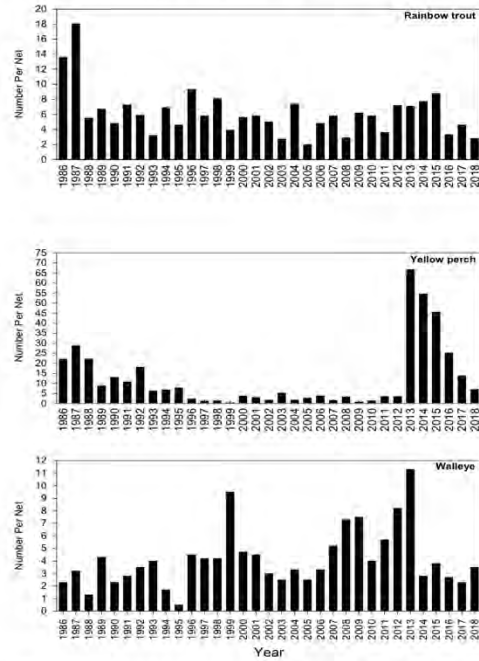


Figure 7: Holter Reservoir Fish Population Trends for Rainbow Trout, Yellow Perch, and Walleye from Standardized Gill Netting Series.

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When you review the actual data, walleye numbers in Hauser were very low until 1998, but it is only fair to recognize walleyes were stocked by FWP from 1989 through the late 1990’s.

When you look at the data, walleye abundance has not just “increased substantially throughout the system” as stated. In fact the numbers in Holter in 2017 were very low, with only three years in history being lower. And in fact as of this fall, walleye numbers are at record low numbers with 1.5 fish per net.

Also, the statement that suggests walleye size distribution and growth rates have been negatively affected is true in part.....but it is misleading because what is important is that the growth rates for walleye in Canyon Ferry are not below what would be considered normal. In fact the growth rates for walleye in Canyon Ferry are above every other fishery in the Montana, and above what would be considered average or normal growth rates across the Midwest. So why, are we suggesting current levels of walleyes are adversely affecting growth rates? This suggests an ongoing problem that no longer exists and is not supported by current data and should be deleted. Growth rates for walleye in Canyon Ferry may have been reduced from the initial years, but overall the growth rate and condition factors of walleye are above normal reviewing relative size distribution and relative weight charts today and when compared to other fisheries around the country. There is no evidence when walleyes are

within the established abundance goal of 5-7 that they are stunted and suffering, to the contrary, their condition factors and growth rates are very good and above the norm.

So I believe it is justified to edit this paragraph and/or simply delete it.

If it is important to have some comments, then stick to what accurately portrays what we have and we would suggest the following language to replace the above:

“Over the past three decades walleye numbers in the mainstream reservoirs have fluctuated significantly with record highs at Holter in 2013, record highs in Hauser in 2017, and record highs in Canyon Ferry in 2018 and record lows in Holter in 2019. Prior to 2007 numbers in Holter were relatively stable with on average just over two, to just over 4 fish per net.

Years with record high levels of walleye have had negative impacts on forages and resulted in relative weights and conditions factors for walleye clearly showing the carrying capacity of the system had been exceeded.

So it is important to recognize, walleye numbers need to be kept in check to sustain a healthy fishery. The relative abundance goals established in the plan for each species, the PSD goals for walleye along with condition factors and relative weights and growth rates need to be evaluated to determine appropriate levels of harvest needed to sustain a quality-multi species fishery.

Management efforts through changing angler harvest limits has very successfully suppressed walleye numbers in both Canyon Ferry and Holter. Other options may need to be considered for Hauser.

#### **Change and Requested Edit # 7**

P 20, par. 3 also says in part “Walleye population abundance throughout the system have all reached record high abundance levels which typically coincided with historic low forage fish abundance.

This comment again misrepresents the overall situation as it is and sends a very negative slant to what the current situation is and should be deleted. Or if a comment is needed we would suggest;

“We have seen record highs and record lows....for both walleye and perch.”

Note: in some cases record low perch numbers correspond to record low walleye....looking at Canyon Ferry in 2004, or looking at years with higher numbers of both perch and walleye for both CF and Holter. There is not the absolute direct correlation that high walleye absolutely means lower perch. In fact the highest level of perch ever recorded at Holter was the same year the walleye numbers were at record highs.” “The primary factor influencing perch is the lack of spawning habitat and cover.”

Simply review Appendix A page A-5 that shows walleye numbers in Holter in 2017 being relatively low...in fact there were only three years in history where the numbers were lower. This point was made at the Advisory Committee meetings and evidence is there to support it. So if walleye abundance goals are being met, and perch or trout drop, the answer is NOT to automatically further suppress the walleye, irregardless of abundance and condition factors being considered.

### **Change and Request edit # 8**

P. 21 first bullet says in part...."predation by walleye further reduces recruitment of successfully reared fish."

I guess I have to wonder how significant this really is to include in the plan. I understand that prior to changing the stocking plan to stock 7" trout this was an issue. But subsequent to that, I have a hard time buying all the 13" walleye are reducing the trout. I thought it had been pretty well accepted and documented trout numbers are related primarily to the stocking levels and walleyes currently had minimal if any measurable impacts.

To not continue to try to alienate and create friction between trout and walleye anglers....I don't think that statement is needed in the plan or if so without further clarification.

### **Change and Request Edit #9**

P 24, bullet 1 under All Reservoirs says...."Continue conservative harvest regulations to minimize impacts by anglers and mitigate ...predation." This is in the section dealing with perch. So is the 50 fish limit, with no possession the "conservative limit, they want to continue on Holter. We absolutely should be considering conservative limits, but this suggests they believe that already are and this is not acceptable.

Maybe the "continue" needs to be changed to "consider".....there is a significant difference in meaning.

The significant reduction of perch numbers in Holter generated a lot of discussion and public perception is that the liberal 50 fish daily, no possession limit is part of the problem. So it seems reasonable to at least consider limits that could help sustain the fishery.

### **Request for Clarification....possible edit # 10**

P 25, first bullet under All Reservoirs says in part--- Regulation Changes will first be dependent on walleye abundance and size structure but it goes on and says "relative to goal ranges for walleye, other fish and forage availability".

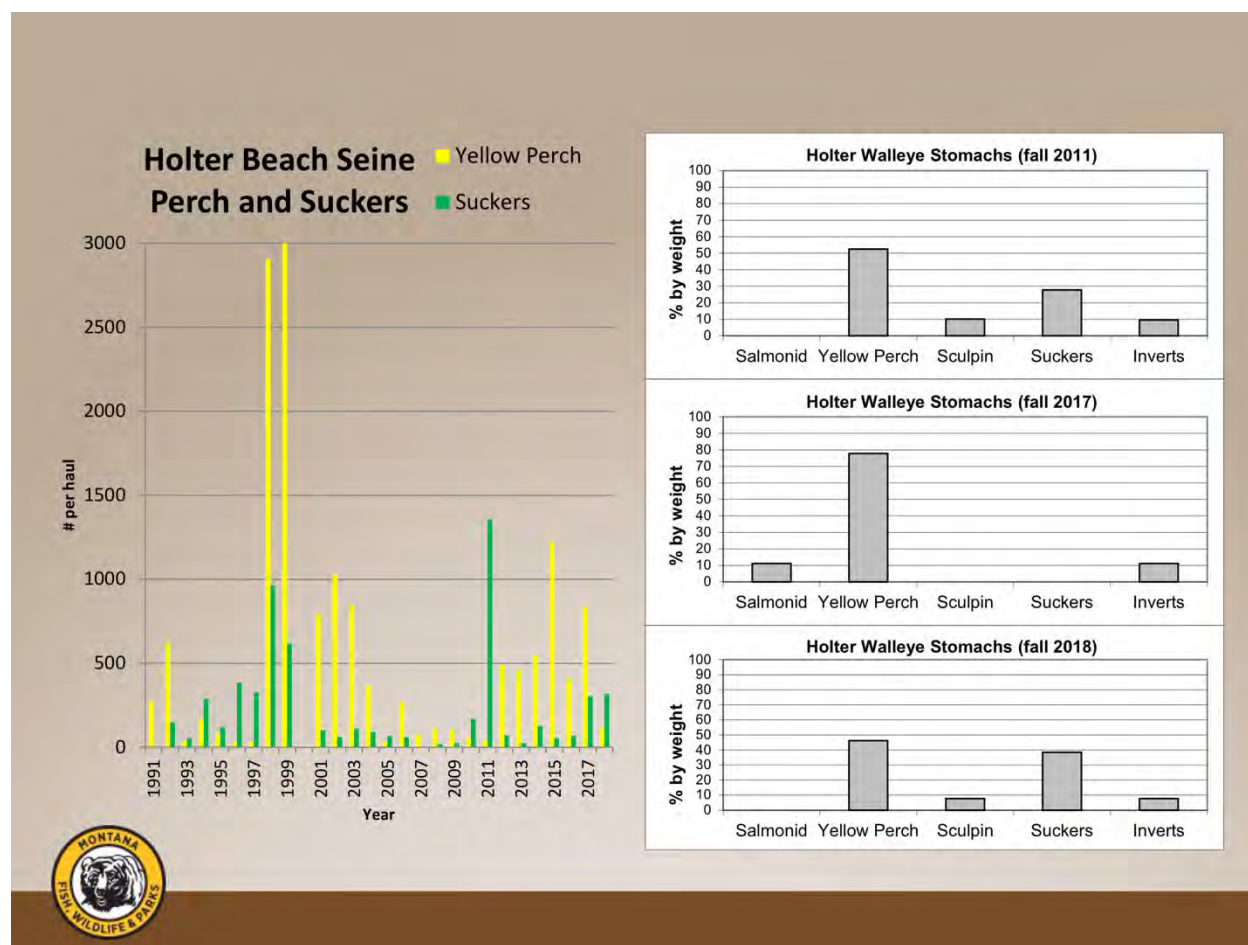
So what does it really mean? I actually believe this needs some editing....we believe changes should only be made after considering relative abundance and PSD goals for walleye along with relative weights and condition factors and growth rates. Period. Those things will address the issue and adequacy of forage will be reflected in those numbers.... Again specific ties to goal ranges for every other species should not be the determining criteria. We typically will see fluctuations and cycles with other fish and forages, when one goes up, one goes down...historical data confirms this, but if you say you can only consider changes for walleye when all other goals are met, you are practically stating you will never change walleye limits. What matters is whether the fish are healthy or not.

## Change and Request Edit #11

Page 21 ....2<sup>nd</sup> bullet says "Walleye diet studies indicate a high preference for yellow perch, suckers, and trout." It goes on and in effect says predation of trout could impede ....fish stocking...

I don't believe data supports the "high preference" for trout as stated. Information presented by FWP per the following slide showing walleye stomach samples for 3 years....**shows two years with no trout**, and 1 year with 10% by weight....90% was other forage. I don't believe that data supports the claim above and it should be removed.

Or edited to show that "Although on occasion walleye may utilize trout as a forage, data shows trout is not a primary, high preference, or preferred forage for walleye.



We believe the edits and requests for changes are critical to being able to have a good management plan that gives good direction but does not overly restrict options and best management practices.

Thank you for your time and consideration

# APPENDIX A

## Reservoir Fish Population and Angling Trends

Canyon Ferry Reservoir – Principle game fish population trends

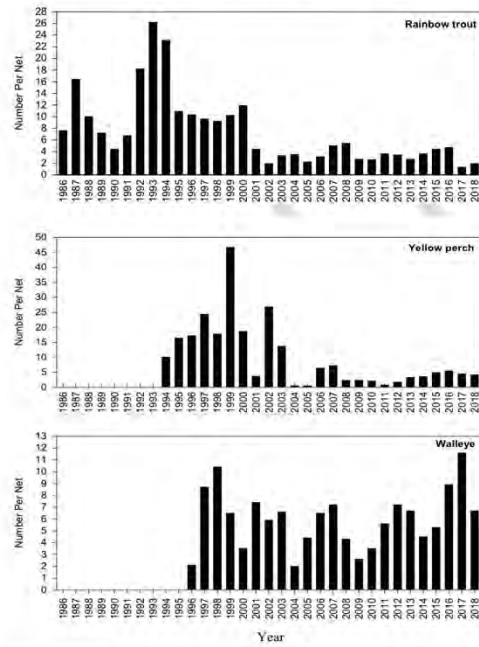


Figure 3. Canyon Ferry Reservoir Fish Population Trends for Rainbow Trout, Yellow Perch, and Walleye from Standardized Gill Netting Series.

# APPENDIX A

## Hauser Reservoir - Principle game fish population trends

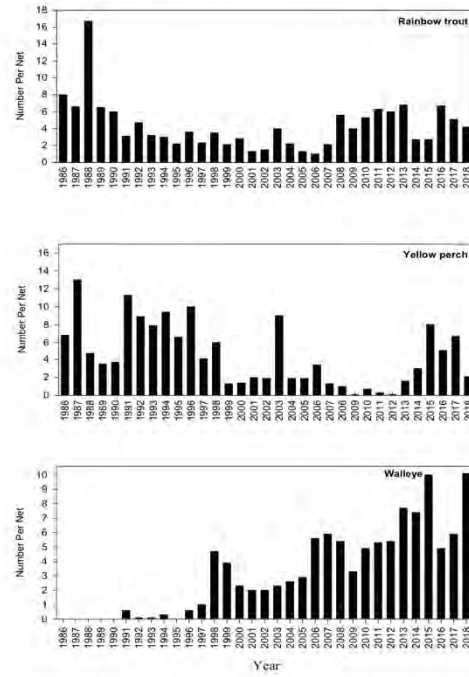


Figure 5. Hauser Reservoir Fish Population Trends for Rainbow Trout, Yellow Perch, and Walleye from Standardized Gill Netting Series.

# APPENDIX A

## Holter Reservoir – Principle game fish population trends

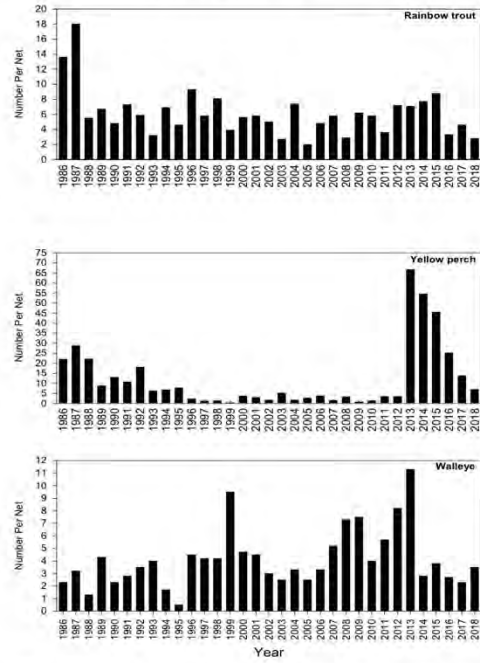


Figure 7. Holter Reservoir Fish Population Trends for Rainbow Trout, Yellow Perch, and Walleye from Standardized Gill Netting Series.



## Roberts, Eric

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**From:** Dale Gilbert <mtwalleyellc@gmail.com>  
**Sent:** Friday, November 15, 2019 3:32 PM  
**To:** FWP Fishing  
**Cc:** Rhoten, Jason  
**Subject:** [EXTERNAL] Additional Edit request to Draft UMRRMP on perch limits for Holter.

I am not sure the comment went through on line, if it did, my apologies for this as a duplicate. Just wanted to make sure it got submitted and considered.

I am happy to see the Department is finally bringing forth a proposal to try to help the Holter Fishery. Following the past management plan and actions we now see the Holter Fishery in the worst, condition it has been in my 39 years in Montana.

I believe what we are seeing at Holter right now supports an additional edit to the UMRRMP draft for perch.....when the perch numbers are within goals, a 25 fish limit seems reasonable, howere if perch goals are not being met, a more conservative limit should be considered.

See below for justification.

At Holter, Perch numbers have been worse in 8 of the past 34 years....interestingly, when it had the 25 daily and possession limits that are currently being proposed and per the current Draft UMRRMP recommendations.

So although I wholeheartedly support a reduction of the 50 daily and no possession limits for perch, I have to really wonder if the proposed reduction to 25 is the solution. Appears to me that the 25 perch limit as we have seen in the past has not done very well and that a further reduction in perch limits is fully justified. Perch are a schooling fish and given today's anglers knowledge, skill, advanced technologies (electronics with side imaging, downscan and GPS), and the information network, continuing with a 25 fish limit will simply continue to suppress the perch numbers below recommended relative abundance goals.

Perch numbers were worse in 1997, 1998, 1999, 2002, 2004, 2007, 2009, and 2010 and I believe that was when they had the 25 daily and possession limit. Doesn't that suggest that 25 fish limit is too high to sustain the perch fishery?

When the perch limits on Canyon Ferry were reduced to try to improve the perch fishery data shows a definite improvement. That suggests that the same thing needs to be considered at Holter.

Frankly, I was on the working group that was making recommendations for the upcoming new UMRRMP but I honestly don't think anyone expected we would ever see the perch numbers get as low as they have gotten at Holter. Maybe that plan should be modified, so that if the perch are within goals, the limit should be the 25 as proposed, but if below goals more conservative limits should be considered.

With numbers as low as they are, wouldn't it make sense to reduce the limit to 10-15 daily with twice the daily for possession? It would seem like this would give the fish that are left a much better chance to bounce back

So, bottom line I believe the actual reductions proposed need further review and consideration to the historical data we have and then revised to truly improve the fishery --- to give it the best chance we can to recover.

Sent from my iPad

## Roberts, Eric

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**From:** tlp@midrivers.com  
**Sent:** Saturday, November 16, 2019 2:14 PM  
**To:** FWP Fishing  
**Cc:** dpyrah2@gmail.com  
**Subject:** [EXTERNAL] Upper Missouri River Reservoir Fisheries Management Plan 2019-2028

To it may concern:

Thank you for the opportunity to comment on the draft proposal for the Upper Missouri River Reservoir Fisheries Management Plan for 2019-2028.

I would like to address some points from the FACT sheet, and Part IIIB and Part III C of the management plan.

\*Regarding Yellow Perch Management. I support the recognition that yellow perch are the primary forage species in the Upper Missouri River Reservoir system. I also support the proposal to reduce the daily bag limits that were presented to the commission for Holter. Fishing regulations must be responsive to population changes in yellow perch in order to buffer some of the large population swings that regularly occur. Focus should be on maintaining a viable population of yellow perch as the primary forage base referenced on page 23 Part IIIB. Protecting the yellow perch population in some fashion is necessary as it is apparent there is no internal FWP support to introduce additional forage species. Further, I support the statement "explore options to enhance yellow perch populations throughout the plan area." Additionally on page 24, "Continue current habitat enhancement opportunities (e.g., artificial habitat, stocking, or transferring fish." I believe that R4 biologist Clint Smith has talked with biologists in the Helena area regarding transferring fish from East Fork reservoir to Canyon Ferry to supplement Yellow Perch populations. This should be seriously explored. There are probably some NGO's that would be willing to provide labor and monetary support to help with this endeavor which should aid in the numbers of Yellow Perch available to anglers and/or reproduce. Explore additional means to enhance Perch populations. I think the key to the Walleye fishery, which is important to me, is an adequate forage base.

\*Regarding Trout Management. I support FWP seeking legislative support to return stocking to levels outlined in the UMRRFMP for the duration of the management plan as outlined. Maintaining these fisheries as a multi species fishery is important to a wide variety of anglers.

Regarding Walleye Management. I support the use of PSD rates for the three reservoirs. There seems to be some ambiguity between the FACT sheet and Part III-B concerning Canyon Ferry and Holter. It is referenced in the FACT sheet as 30-50 at Canyon Ferry and 40-60 for Holter. In Part III-B page 25, the reference is to 30-60 for all reservoirs. For editing purposes, these numbers should be the same and need corrected. I support the numbers presented in the FACT sheet, although my preference is to push towards the upper limits of those range to move towards more of a quality fishery.

Additionally, regarding limits. There are a number of Walleye anglers that are not consumptive fisherman, and I believe the survey results support that statement. I understand the need to take smaller fish out of the population, but we need to place a slot limit in the regulations to allow some of those fish to remain in the system long enough to become quality fish. I support the 6 limit of walleye and the slot for Holter that was proposed last week. That may not be the complete problem at Canyon Ferry, but the interrelatedness of the fisheries as a whole should not go unnoticed and I support the reduction of Walleye Bag limits, and implementing a slot limit for Canyon Ferry.

\*Regarding Tournament Fishing. Tournament fishermen provide a large amount of economic support to the communities near the three reservoirs. These anglers constitute a significant component of hard core tournament

fishermen that utilize all three bodies of water on a regular basis. It would be interesting to break down the number of angler days presented in the management plan into categories of fishermen and the amount of fishing that each contributes to the total number of angler days. It may present a truer picture of what the majority of anglers really do want for composition of the fisheries in the management plan.

Again, thank you for the opportunity to comment.

Don Pyrah, Lewistown.

**Roberts, Eric**

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**From:** Wedde, Kim on behalf of FWP Fishing  
**Sent:** Tuesday, November 12, 2019 1:22 PM  
**To:** Strainer, Adam  
**Subject:** FW: [EXTERNAL] Comment on Upper Missouri Plan

-----Original Message-----

From: Kalkofen, Jim & Marsha <nisspak@brainerd.net>  
Sent: Monday, November 11, 2019 8:43 AM  
To: FWP Fishing <fwpfsh@mt.gov>  
Subject: [EXTERNAL] Comment on Upper Missouri Plan

Sir, I propose that the department amend this plan to include walleyes. Select one system and create a world-class walleye fishery, which also contains some trout. The other reservoirs would be managed mainly for trout and the walleye suppression efforts could continue in those waters.

Unfortunately, due to management or as some declare, "mis-management," a trophy walleye fishery was completely dismantled. Bring it back!

Thanks for your consideration.

Jim Kalkofen  
PO Box 722  
Stevensville, MT 59870

PS: I fish trout, walleyes and just about everything with fins. My fish do not all have to have an adipose fin.

## Roberts, Eric

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**From:** Roberts, Eric  
**Sent:** Monday, October 28, 2019 3:49 PM  
**To:** Wedde, Kim; FWP Fishing  
**Cc:** Strainer, Adam  
**Subject:** FW: \*\* Email from fwp.mt.gov \*\*

Please include this with the reservoir plan email comments.  
ER

**From:** noreply@mt.gov  
**Sent:** Wednesday, October 23, 2019 11:19 AM  
**To:** Roberts, Eric  
**Subject:** \*\* Email from fwp.mt.gov \*\*

**Name:** Jim Stipcich  
**Phone Number:** (406) 461-2252  
**Email:** [stip@mt.net](mailto:stip@mt.net)

Mr. Roberts

After the first public meeting in Helena on the original delayed draft plan I approached you and shared my perspective that your tone and comments at that meeting reflected a preconceived bias against walleye and a contentious attitude towards walleye supporters. I believe this current draft reflects a similar bias towards walleye in general and it certainly is written in a manner that is leading many walleye supporters to feel it is contentious towards them. In several areas, Words could (and should) have been chosen in the writing of this report that reflect the give and take between fishing species that I heard expressed by the vast majority of those who commented while still permitting management practices that may have to be taken in dire circumstances.

It is so sad that the FWP has again moved against so much of the pro walleye public support input it has received. Nothing can make government look worse than to ignore the direction of those it is supposed to be serving AND to ignore its own BIOLOGICAL DATA. Many of us participated to various degrees in the so called public input stage and were encouraged by the dialogue with front line staff at FWP that they were willing to listen to all. Why did their perspective change? Who above them influenced their thoughts? What other recourse will we have once the Commission slams this thru?

Stop buying Montana fishing licenses?  
Fish in other states and countries?  
Legal challenges?  
Electing leaders to our government who will make appointments to the Commission that will represent all Montanans views and all wildlife views?

It is understandable from a tourism perspective that no perceived threat can exist to the trout fishing in the Mighty Mo but to manage things in a way that is out of touch with biological data and reality is also a huge risk and to express such in an inflammatory manner is an outright insult to Montana citizens. .

It is so sad that this report is written in such a contentious manner to alienate walleye supporters. We all know we all

have to give and take in our society. It is too bad the report writers and their superiors did not reflect the conciliatory tone in the report that many of them (but not ALL) tried to exhibit in the process.

It is another sad day for the relationship of all lovers of wildlife in Montana.

Jim Stipcich

## Roberts, Eric

---

**From:** Stip <stip@mt.net>  
**Sent:** Wednesday, October 23, 2019 11:02 AM  
**To:** FWP Fishing  
**Cc:** Jim Stipcich Home  
**Subject:** [EXTERNAL] comment on draft Upper Missouri River Reservoir Fisheries Management Plan

It is so sad that the FWP has again moved against so much of the pro walleye public input it has received. Nothing can make government look worse than to ignore the direction of those it is supposed to be serving AND to ignore its own BIOLOGICAL DATA. Many of us participated to various degrees in the so called public input stage and were encouraged by the dialogue with front line staff at FWP that they were willing to listen to all. Why did their perspective change? Who above them influenced their thoughts? What other recourse will we have once the Commission slams this thru?

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It is so sad that this report is written in such a contentious manner to alienate walleye supporters. We all know we all have to give and take in our society. It is too bad the report writers and their superiors did not reflect the conciliatory tone in the report that many of them (but not ALL) tried to exhibit in the process.

It is another sad day for the relationship of all lovers of wildlife in Montana.

Jim Stipcich



November 17, 2019

Montana Trout Unlimited  
312 North Higgins, Suite 200  
P.O. Box 7186  
Missoula, Montana 59807

Montana Fish and Wildlife Commission  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, Montana 59620-0701

Re: Montana Trout Unlimited comments on *Draft Upper Missouri River Reservoirs Fisheries Management Plan, 2020-2029*

To Whom It May Concern:

Thank you for the opportunity to provide comments on the *Draft Upper Missouri River Reservoirs Fisheries Management Plan, 2020-2029*. As we have reviewed the document, it is evident that a great deal of work and deliberative consideration went into the development of this draft plan for the future management goals on the Upper Missouri Reservoir system. We appreciate to have had the opportunity to be involved in the process, and we wanted to be sure to continue our participation by offering formal written feedback on these proposed changes to management strategies. Montana Fish, Wildlife, and Parks, and the Fisheries Division in particular, have gone above and beyond to involve the public through both the robust scoping and public hearing process. We appreciate that effort and commitment to a robust public process.

Founded in 1964, Montana Trout Unlimited is the only statewide grassroots organization dedicated solely to conserving, protecting, and restoring Montana's coldwater fisheries. Montana Trout Unlimited is comprised of 13 chapters across the state and represents approximately 4,500 Trout Unlimited members. A number of our chapters and local members helped inform the comments on the proposed changes that are found below.

Montana Trout Unlimited has great interest in the effects of any proposed changes to the management of the Upper Missouri Reservoir system, particularly as they stand to affect the wild trout resources and river stretches within the system. We also have great interest in the increased flexibility, adaptive management approaches, and public involvement for the various constituencies within the system that the draft plan proposes. These changes come at a critical moment in the management of our fish and wildlife resources given the increasing challenges facing our native fish resources by threats like climate change, competition and predation from



illegally introduced species, and not to mention increasing angling pressure. We continue to promote fisheries and resource management strategies that preserves and improve populations of wild fish, with a significant priority on native fish species where possible. While the draft management plan is but one tool that is available through which we can accomplish these goals, we do believe that it plays a significant role in guiding those efforts.

Montana Trout Unlimited offers our thoughts on the following proposals in the *Draft Upper Missouri River Reservoir Fisheries Management Plan, 2020-2029*:

- *Citizen Advisory Committee:* We strongly support this new proposal in the draft plan. This proposal will markedly improve the public involvement process moving forward, particularly as we move towards a more adaptive resource management strategy within the system. We believe that this more formal involvement process can help improve buy-in from constituencies and will continue to improve the relationship between the Department and those user groups. That is certainly a lesson that we have learned from the drawn-out revision process for this plan over the last years – more intentional involvement from a diverse body of users will improve the durability of the management process. We believe this new approach offered in the draft is a good first step to improving the quality of dialogue between interests.
- *River Sections:* We cautiously support the approaches as presented in the draft plan. We continue to reiterate that the primary management objective in these two river stretches of the system (Toston Dam to Canyon Ferry Reservoir and Hauser Dam to Holter Reservoir) should be for the management of wild trout. While we acknowledge the now unavoidable presence of illegally introduced predatory fish, such as walleye and northern pike, these reaches are important reaches of river system for wild trout. Particularly, the various tributaries in both stretches of the river offer important spawning and rearing habitat for wild trout. Montana Trout Unlimited and our local chapters have spent thousands of dollars conserving, protecting, and restoring wild trout habitat in these stretches, and we want to once again reiterate our insistence that in the river sections wild trout management be the top priority.
- *Reservoir Sections:* We do not have strong opinions one way or the other on the management strategies proposed for the reservoirs in the draft plan at this time, rather we will look forward to participating in the adaptive management discussions through the Citizen Advisory Committee process to comment on the science driven developments that occur in the next ten years within the system. In that process, we will continue to strongly advocate for the inclusion of primary wild trout management objectives in these reservoir stretches. However, we also recognize the complex and often competing interests within the reservoirs of the system that create unique management challenges for the Department. We do believe that if we are collectively going to manage for an illegally introduced species, like walleye, in the Upper Missouri system, the reservoirs are the place to do it. Finally, we have been strong supporters of restoring the Fisheries Division budget for the 2021 biennium in the Legislature, knowing that the consequences of the dramatic cuts suffered as a result of the 2019 biennium created a significant impact on the

management of this system. In fact, Montana Trout Unlimited was the only constituency group that was in the room for those budget discussions advocating on behalf of the Department.

- *Northern Pike*: While not directly addressed in this plan, we do support ongoing suppression efforts for illegally introduced, non-native, invasive species like northern pike. We appreciate the efforts of the Department to lead on this issue.
- *Continue science-based resource management*: Overall, Montana Trout Unlimited continues to stand behind the Department's efforts to manage our fish and wildlife resources with the best science available. While we wish to go on record to strongly support the increased public participation that is suggested by this draft plan, at the end of the day we will continue to support the Department using science to lead the way in all future management decisions within this system and the state as a whole.

Please do not hesitate to contact us with any questions, or if you need additional information regarding the comments that we have submitted (via email at [clayton@montanatu.org](mailto:clayton@montanatu.org) or by phone at 406-543-0054). Again, we thank you for the opportunity to comment, and we appreciate the open public process used by the Department to make these changes.

Respectfully,



David Brooks  
Executive Director  
Montana Trout Unlimited



Clayton Elliott  
Conservation and Government Relations Director  
Montana Trout Unlimited

cc:

FWP Director Martha Williams  
Fisheries Division Administrator Eileen Ryce  
Fish Management Supervisor Eric Roberts  
Natural Resource Policy Advisor to the Honorable Steve Bullock, Patrick Holmes

**Roberts, Eric**

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**From:** Matt Zeadow <zeadow@mt.net>  
**Sent:** Sunday, November 17, 2019 9:02 PM  
**To:** FWP Fishing  
**Subject:** [EXTERNAL] Comment

Page 27 you guys have increase walleye harvest limits if perch abundance doesn't increase to goals or above. The problem is you guys set the perch goals to high they have not been over 3 in the last ten years so how are they going to hit 6. So what that means is you will never drop Walleye harvest because perch goals are set to high. I would like to see the department start to positive manage for walleyes Instead of negative management. Like the words wild trout Well all the walleyes in the system are wild walleyes say that then also or remove it from trout. Also the way walleyes got into canyon ferry that has never been proved so it's all alligation and personal opinion are this point that they where illegally introduced. The plan has good things in it but a few things need to be changes like page 26 should be deleted like you guys have said you will. The other items I have went over with Jason and I hope the department takes a long look at this and makes the right choices. There was 4 meeting I attended 3 of the 4 if you look at all the interests on the sheet you had everyone sign there was 99% walleye guys and one trout guy. So that shows people want good walleye fishing in canyon ferry Hauser and holter. Also the part that says we have seen record high numbers of walleyes we have also seen record low numbers as well but that's not in the plan. Please review what we sent in and make changes to the plan and ask dale and I to come in and review the plan with you before it goes out to the public so we as a group can walk In and support the plan in front of the commission. We have a lot of eyes on this and people want to see changes please make the correct choices and keep the personal opinion and side beliefs out of the management plan. Thank you

## Roberts, Eric

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**From:** Wedde, Kim on behalf of FWP Fishing  
**Sent:** Thursday, November 07, 2019 2:37 PM  
**To:** Strainer, Adam  
**Subject:** FW: \*\* Email from fwp.mt.gov \*\*

Another new one.

Kim Wedde  
Administrative Assistant  
Fisheries Division  
Montana Fish, Wildlife & Parks

P.O. Box 200701  
Helena, MT 59620-0701  
Ph: (406) 444-5594  
Montana FWP | Montana State Parks | Montana Outdoors Magazine

-----Original Message-----

From: robert jones <jonezyrl@gmail.com>  
Sent: Thursday, November 7, 2019 1:09 PM  
To: FWP Fishing <fwpfsh@mt.gov>  
Subject: \*\* Email from fwp.mt.gov \*\*

Name: robert jones  
Phone Number: 406 647 1268  
Email: jonezyrl@gmail.com

This message is meant for Adam Strainer Helena region fisheries biologist. I just read a news article about limit reductions for perch in Holter Lake. I totally support a 25 daily and possession limit. I regrettably missed the spring and fall public comment periods for fish regulations so I am glad to see the perch problem in Holter is being addressed. We enjoyed the 80's perch boom and the boom of this last decade. I hope the new regulations can begin for the 2020 fishing season.

	End Date	Name (optional):	Email address (optional):	Comment
1	2019-10-23 12:40:46	Tyler Bumgarner	tabumgarner@yahoo.com	I'm not sure what possess you guys to increase the walleye limit to 20. The only people that want this change are the guides, most of which are not from Montana and most of their clients are not from Montana either. Start listening to the actual Montana people, this is not what any of us want, and you have no scientific data to show for this change, you have no valid reason except for out of state money. You have already caused the hunting situation in Montana to go to shit, don't do it to the fishing too.
2	2019-11-05 10:03:15			We need less trout in the state and more walleyes. Rainbows and browns are not native too
3	2019-11-07 12:38:21	Dale Gilbert	MtWalleyellc@gmail.com	Page 21 ....2nd bullet says...• Walleye diet studies indicate a high preference for yellow perch, suckers, and trout. At current yellow perch and sucker population levels and reproductive capability, it is unknown if these species can adequately maintain a sustainable forage base for the walleye population. Predation of stocked trout could impede the cost-effectiveness of fish stocking and hinder recruitment to the fishery. It is difficult to accept this statement looking at data we have. In a recent presentation on Holter FWP showed a slide of walleye stomach samples over 3 years, 2011, 2017, and 2018 and only in one year was there any trout identified and then it was about 10% by weight. So realistically over a three year history, trout average just a bit over 3% of the walleye diet. That doesn't correlate with the statement above about how walleyes have a "high preference for trout." This is just another example of an apparent bias against walleyes by FWP. It has been documented quite well, that the quality of the trout fishery is primarily dependent on the level of the stocking. We very clearly can see when stocking has been cut in half the past two years, that trout abundance has dropped significantly. It is not because a walleye ate a trout. In reality, big fish eat little fish. Walleyes and trout co-existed for decades in the Missouri River and we at one time had quality trout and walleye fishing. Liberal limits have done nothing to impact the trout fishing...all that has been accomplished is the ruin of the walleye fishery.
4	2019-11-08 07:15:39	David Hallfrisch	hallfrischdavid40@gmail.com	If you change the limit for perch to 25 daily on Holter, that is a good start, now to make it effective, you need to have a warden on this lake. I have not seen a warden on Holter in years, and the slob fisherman know this, I know of one guy that took 150 perch a day for a week, and was not checked by one of your wardens, this is not right
5	2019-11-09 09:39:17	Bob mahana	Bobltfdeb@branan.net	As it has been pointed out page 26 and 24 need to be deleted. It seem that Adam S is not being straight forward with the finding of the netting on cf. ie math used determine walleye populations. It is very miss leading. The more the public uncovers describes or cover ups the more the FWP fishery reputation suffers. Thank you
6	2019-11-10 06:07:15			put in tiger musky to get rid of all the trout
7	2019-11-10 10:56:55	Richard Tramp	tramprichard@gmail.com	We need to embrace walleye as the fish that makes Canyon Ferry a place to fish. If we need more perch stock them easy to raise. Wisconsin has I think a great way to create habitat for perch by anchoring large trees on shore lines, We could do this in bays to stay out of the wind. We could get help from all fishing groups. I ask myself why is there so many changes to the present draft plan???
8	2019-11-10 19:27:39			RE: Holter Reservoir Walleye and perch.- First off, you may find this communication insulting. If so, it is not even close to the insulting way you treat warm water fishermen in Central Montana. You have proven you are deaf to warm water fishermen, especially in Holter. Is common sense gone in the regional department? We told you arrogant "public servants" for years that you put a limit far too high on perch and walleyes in Holter. You ruined walleye fishing in Holter way back when Dalby was in charge. Next you ruin perch fishing there as well with glutinous limits. But you were happy with disastrous declines in those populations of perch and size of the walleyes because you kept right after it. Yeah, I suppose the results were politically correct and probably very popular with the trout guides. But we perch lovers understand nobody needs 25 Perch per day, every day. Make it 25 per day and possession That is still a high limit. You have already proven you don't understand a perch, so why not listen to common sense for a change? Walleye, perch, and trout fishing was all good for many decades, before you newbies came here and tried to micro manage things. Go back to the slot walleye limit of the 1980s and a reasonable perch limit. Eric, you should be ashamed of what you have done to the fishing our local reservoirs. This is on you! Time to make it right.
9	2019-11-12 08:14:28	Richard Tatarka	tatarka2952@gmail.com	Having read the entire Draft, clearly one can see that the FWP Biologists have done a remarkable job researching before implementation of this plan. Obviously thousands of dollars have been spent doing the research by experts in the field of fish biology. So I'm wondering, if the FWP has sound evidence on how to best manage this particular fishery, why are they letting certain groups of people's emotions dictate what the FWP does with their plan? We have been fishing Canyon Ferry every summer for the last 10 years and have noticed the steady decline in the quality of the trout fishing. Whereas we are not what you would consider the trophy walleye elite type fishermen, I would say that based on the type of fishing we use that the perch and walleye fishing has for us remained relatively the same over the past 10 years. Obviously though, there is an overabundance of walleye, and one can clearly see the need for the regulations regarding keeping and eating lots of them, yet this one good tool to help manage the huge number of walleye in Canyon Ferry goes practically unused. (70% of walleye fishermen throw all walleye back and don't keep any).
10	2019-11-12 12:55:21	Marc Murfitt	marc@tsopmt.com	First of all, the draft is well organized, and I appreciate the opportunity to comment. I grew up in East Helena and fished the region in question since I was a small child. I generally fished it through the ice. Canyon Ferry was an excellent place, at that time, for a kid to learn to fish. The fishing was incredible. My father generally fished for trout, and I would kill time catching yellow perch. The perch fishing was simply amazing and I so miss those days. You could literally drill a hole through the ice anywhere, and I mean anywhere, in that lake and catch perch 1 after the other. At that time I didn't realize how tasty perch were, and my father had no interest in them so I would catch and release them. In high school I learned to fillet them and found them amazing table fare. In the late 80's I began to search for pockets of perch and still had excellent fishing. Around the mid 90's it was harder to land on them. In the 2000's it became worse and I started to travel to different lakes to fish for perch because it was pathetic at Canyon Ferry. By the way, you could always and can still catch trout. Unfortunately, they are inedible in my opinion. I once again started fishing Canyon Ferry in about 2015 and usually do fairly well catching perch and walleye. A 10 perch limit is poor as compared to my youth. The walleye are all about 11 to 13 inches in length consistently. So, there is a bit of background. It seems that, in order to sustain good populations and decent fishing, habitat and forage are needed throughout the system. Structure/habitat in Canyon Ferry is an issue and I don't know how many Christmas trees will make a difference or man made structures. That leaves forage. I do not understand the reluctance to add a forage species. The fish need something to eat simple as that. The walleye hammer the perch, suckers, trout plants, and ling with reckless abandon. The walleye are there to stay so let's feed them and take some pressure off the other species. If the FWP fisheries are so dead against adding a new forage species then stock millions of perch and white suckers just do something. Lastly, FWP needs to start paying attention to fishermen other than trout fishermen. I would love to be able to fish a reservoir an hour from my house vs travel to Peck, Nelson, Tiber and etc. Thank you for the opportunity to comment. Sincerely, Marc Murfitt

11	2019-11-12 15:45:45	Ryan Schmidt	rmschmidt60@gmail.com	I appreciate the work you all put into this. Anything that can be done to keep Rainbow numbers steady and increase Brown Trout numbers in the Hauser tailrace is my hope. Special thank you to the gentleman (60's, Gray hair, sometimes a walking stick) that does creel surveys in the LOG section. I've run into him numerous times in the Spring at Beaver Creek and in the fall below Hauser Dam. Just a super nice guy and always a fun chat. A great representative for FWP
12	2019-11-14 06:01:32	Dave Salvi	davesalvi@gmail.com	I support the proposals in the management plan. In particular, I totally support northern pike suppression/elimination efforts. Also, I would propose a more limited approach to fishing contests and commercial guiding, both of which monetize a public resource at the expense of the public as follows: 1. Contests - no more contests added unless one is discontinued. 2. Commercial Guiding - institute a system so that there are designated stretches and days open to guides such as is being done on the Big Hole. Everyone is happy; the guides get to work and the fishery is not abused. Finally, and I know everyone would have a stroke at this suggestion, but I think that at least on certain over-used waters we should go back to having certain periods of the year closed to all fishing. The reasons are obvious, but basically as the study shows, the increased use of the fishery, and more importantly, the projected increased use needs to be managed. I think we are already seeing impacts to the quality and number of fish. Thank you.
13	2019-11-15 14:25:49	Dale Gilbert	Mtwalleyellc@gmail.com	I am happy to see the Department is finally bringing forth a proposal to try to help the Holter Fishery. Following the past management plan and actions we now see the Holter Fishery in the worst, condition it has been in my 39 years in Montana. I believe what we are seeing at Holter right now supports an additional edit to the UMRMP draft for perch.....when thenper h are within goals a 25 fish limit seems reasonable, howere if perch goals are not being met, a more conservative limit should be considered. See below for justification. At Holter, Perch numbers have been worse in 8 of the past 34 years....interestingly, when it had the 25 daily and possession limits that are currently being proposed. So although I wholeheartedly support a reduction of the 50 daily and no possession limits for perch, I have to really wonder if the proposed reduction to 25 is the solution. Appears to me that the 25 perch limit as we have seen in the past has not done very well and that a further reduction in perch limits is fully justified. Perch are a schooling fish and given today's anglers knowledge, skill, advanced technologies (electronics with side imaging, downscan and GPS), and the information network, continuing with a 25 fish limit will simply continue to suppress the perch numbers below recommended relative abundance goals. Perch numbers were worse in 1997, 1998, 1999, 2002, 2004, 2007, 2009, and 2010 and I believe that was when they had the 25 daily and possession limit. Doesn't that suggest that limit is too high to sustain the perch fishery? When the perch limits on Canyon Ferry were reduced to try to improve the perch fishery data shows a definite improvement. That suggests that the same thing needs to be considered at Holter. Frankly, I was on the working group that was making recommendations for the upcoming new UMRMP but I honestly don't think anyone expected we would ever see the perch numbers get as low as they have gotten at Holter.
13a	2019-11-15 14:25:49	Dale Gilbert	Mtwalleyellc@gmail.com	Maybe that plan should be modified, so that if the perch are within goals, the limit should be the 25 as proposed, but if below goals more conservative limits should be considered. With numbers as low as they are, wouldn't it make sense to reduce the limit to 10-15 daily with twice the daily for possession? It would seem like this would give the fish that are left a much better chance to bounce back. So, bottom line I believe the actual reductions proposed need further review and consideration to the historical data we have and then revised to truly improve the fishery --- to give it the best chance we can to recover.
14	2019-11-15 14:31:31	Sherry Hoekema	hoekedel@q.com	Even though this new plan process has taken 2 years instead of one, I think it is a far better document than the old plan. It allows for more flexibility and adaptability to manage a quality multi-species fishery. PSD goals and relative abundance goals should be considered along with relative weights, condition factors, and growth rates to implement certain management changes. Page 26-bullet 3 "Additional aggressive management technics may be implemented if ... ANY of the following criteria are reached." That is pretty rigid and solid wording. The idea is to provide for flexibility, consider all kinds of variables, then make management decisions, not just consider any of 3 items. Don't tie your hands with that language. Page 29-bullet 2 This is "prejudice" against walleye - that they are related to ANY decrease in perch or trout numbers. That is simply not true. You need to clarify that actions will be taken based on science and historical data AFTER ALL factors are taken into consideration. Page 26-bullet 4 "Upon reaching goal range targets listed above and within the adaptive management framework, more aggressive actions may be implemented ...". What? What? If goals are reached why implement more aggressive actions to further suppress walleye.
15	2019-11-16 08:26:25		bkbahr@q.com	I do not understand why the FWP cannot make a plan that an average person can understand. It appears to me that the plan allows the FWP many different ways to suppress walleyes and very few positive factors to enhance the walleye fishing in Canyon Ferry. Is it not the objective to make all the game fish species available for fisherman to catch and a size that is desirable??? It is getting very hard to listen to the plans to improve walleye fishing in Canyon Ferry and to see what really is happening. With all the years of DATA collected you would think the FWP would be able to do a better job. Thanks for your time. Bob Bahr
16	2019-11-16 12:23:25	Blakely Hay	blakelylh@gmail.com	While I understand this management plan is for a multi-species fishery, I urge the department to keep the river sections managed for TROUT. Thank you!
17	2019-11-16 13:32:35	Jeff J.		Please continue to manage the river system with trout as a priority.

18	2019-11-16 15:07:53	lonnie lundin	claytonlundin@yahoo.com	I feel that it is necessary to remove the statements regarding implementing catch and kill tournaments and commercial fishing for walleyes in the event that other fish numbers call for action. Walleyes are far the only piscivorous fish species present in these waterways. Perch, rainbows, browns and burbot all play a significant role in feeding on young of the year fish of all kinds. To demonize the walleye as the root of all problems is completely flawed logic. The rainbow trout population is 100% put and take, the natural reproduction is slim to none, if rainbow trout numbers fall, as they currently have, consider the fact that they are stocked at nearly 50% rate that they were 3 years ago. I understand that Mt FWP is afraid to introduce forage species after the whole mysis shrimp debacle, but consider the benefits that a forage species could bring, emerald shiners and ciscoes would absolutely bolster the reservoirs and contribute to a reduction in the massive algae blooms that we currently deal with annually. I feel like Canyon ferry specifically has the potential to become much more of a trophy destination similar to Fort Peck, if the forage species were able to support the current piscivorous species. There has to be a better management tool that doesn't involve blame on the walleyes, and minimizing their impact. Walleye are the only reason I and countless others fish these reservoirs and rivers, I am not saying that I don't support a multi-species environment, but it is incredibly discouraging to see the blame for all problems placed on the big bad walleyes. I also believe that all 3 reservoirs should have a total restructure in the current bag limits and possession limits of walleyes. By having 3 reservoirs with 3 separate limit structures all on top of each other it makes it nearly impossible to enforce any kind of limits outside of boarding boats on the water, or checking livewells at the ramps. Overall the current draft seems to make sense, but I just cant support it in its current state due to the obvious negative bias shown toward walleye.
19	2019-11-16 15:26:59			It's time to get rid of the cant do attitude and start managing holter hauser and canyon ferry for better walleye fishing. Forage is the answer and walleye suppression is an excuse not management. The fall netting surveys shows there is no recruitment of mid size fish. No one is satisfied but the local biologist keep trying to spin the data to somehow show everyone is happy and everything is ok. Irresponsible and pathetic.
20	2019-11-16 15:29:42	Mary Ann Tramp	richnma@gmail.com	The management plan should protect certain classes of fish that should be in Canyon Ferry Reservoir that fishermen are fishing for. An example would be the 15-19 inch walleye fish that don't seem to exist in the reservoir at the present time. Thank you for your consideration of this important item.
21	2019-11-16 15:54:55	Bill Sampson	Bill@montanabroom.com	After years of fishing all three reservoirs I have noticed a very sharp decline in the quality of fishing across the board, I believe that there needs to be a more stringent plan, Holter needs to have a 10-15 limit on perch and also should be returned to the 6 limit for walleye with possibly one of the 6 being over 20", I also believe that since the three reservoirs are basically the same system that similar management for canyon ferry and Hauser could follow suit. Another problem I have always had is that the walleye are to blame for all species decline, I catch trout of all sizes with minnow baits as I also catch walleye with the same, if FWP actually believes that only walleye eat minnows they are insane. Other complaint is on canyon ferry everything seems to be based off the perch numbers, if we are really concerned about the perch in canyon ferry then why is the largest perch derby on ice for the region approved every year? I consider myself an avid walleye angler but do also do a few perch trips a year and rainbows can make for an all around fishery. This plan should be managing for a multi species fishery and not have a 90 percent preference for trout
22	2019-11-17 05:53:18	Jim Gillespie	airheaterswest@gmail.com	After attending 2 of the meetings and talking in depth with Jason Rohdin about the bullet points on page 26 of the plan and a few other comments we sat and discussed, I personally feel were headed in a direction of getting people involved with and heading in the right direction. I do believe with out a doubt that some type of forage for other than pines for perch on CF needs to be done and not just talked about. Common sense, science and public involvement need to be in the mix of making and having better fishing opportunities around Helena. Canyon Ferry can be and should be much better than what it is, with the knowledge of how to catch walleye and the preferred table fair of most anglers lets get this back to where it once was. The responsiveness of the plan is crucial we don't need to wait years before determining that a change needs to be made, we have years worth of valuable data that show valuable information lets use it and quit waiting to make changes to a body of water..
23	2019-11-17 20:03:09	Matt Zeadow	zeadow@mt.net	Page 27 you guys have increase walleye harvest limits if perch abundance doesn't increase to goals or above. The problem is you guys set the perch goals to high they have not been over 3 in the last ten years so how are they going to hit 6. So what that means is you will never drop Walleye harvest because perch goals are set to high. I would like to see the department start to positive manage for walleyes Instead of negative management. Like the words wild trout Well all the walleyes in the system are wild walleyes say that then also or remove it from trout. Also the way walleyes got into canyon ferry that has never been proved so it's all allegation and personal opinion are this point that they where illegally introduced. The plan has good things in it but a few things need to be changes like page 26 should be deleted like you guys have said you will. The other items I have went over with Jason and I hope the department takes a long look at this and makes the right choices. There was 4 meeting I attended 3 of the 4 if you look at all the interests on the sheet you had everyone sign there was 99% walleye guys and one trout guy. So that shows people want good walleye fishing in canyon ferry Hauser and holter. Also the part that says we have seen record high numbers of walleyes we have also seen record low numbers as well but that's not in the plan. Please review what we sent in and make changes to the plan and ask dale and I to come in and review the plan with you before it goes out to the public so we as a group can walk in and support the plan in front of the commission. We have a lot of eyes on this and people want to see changes please make the correct choices and keep the personal opinion and side beliefs out of the management plan. Thank you
24	2019-11-17 20:53:31			It doesnt seem right that the wording on page 27 states that the only way the walleye harvest limits will be decreased only if perch and trout abundance are above goals. I dont think that has happened in a while and I havent seen much evidence that the levels are connected only with walleye. I dont think the PSD numbers are good. Seems like the number can get better or be within your "goal" and still miss alot of age classes of walleye. All big or all small and the number can look good like Holter now. PSD in upper 50's and only 9 total fish in the nets with only about 4 over 15" pffft. This whole system has went downhill for quite a few years and I see nothing that is trying to improve it



## COMMENT FORM

Date: 11.6.19  
Name: Chris Edgington  
Please PRINT  
Address Street 630 Barnett Ave.  
City/State/Zip Dillon, MT. 59725

Please write your comments below. Attach additional information to this form if you wish.

While I understand the reservoir system needs to be managed as a multispecies body of water, it is imperative FWP maintains river sections for cold water species. The warmwater fish have decimated trout numbers and every tool available must be on the table to protect the cold water fishery. FWP must continue to negotiate mitigation funding from DNRC on Foster Dam. This is a complex and dynamic system. Good luck,

Thank you.



~~11.6.19~~ 11.6.19  
My name is Dave McKernan, and I am a lifelong resident of Montana. Montana has long been appropriately managed, and should continue to be managed for wild trout. It is our heritage, it makes our state unique. While I understand that it is impossible to reclaim the reservoir system as a trout fishery, the river sections of this system should be aggressively managed for wild trout. Tens of thousands of visitors flock to Montana to enjoy our trout fisheries, not so much for warm water species. I support FWP to do the right thing by managing for wild trout.



COMMENT FORM

Date:

11/5/19

Name:

Jim H. Hill

Please PRINT

Address Street

2665 Hauser Blvd.

City/State/Zip

Helena, MT 59601

Please write your comments below. Attach additional information to this form if you wish.

I Love to fish for many species of fish. Walleye is my favorite and I feel consideration for putting specific bait fish such as cisco in the system to feed the main predator fish Northern Pike, walleye, & smallmouth bass. This would lessen the pressure on rainbow trout & brown trout. They could also benefit from another source of food in the lakes & rivers.



## COMMENT FORM

Date: 11-13-2019  
Name: Ronald Miller III  
Please PRINT  
Address Street 5405 Lower River Rd #29  
City/State/Zip Great Falls, MT, 59405

Please write your comments below. Attach additional information to this form if you wish.

Walleye have been in the upper Missouri for 60 years now. For 60 years they have done no damage to the trout population. If walleye have done no damage then northern pike won't be much different. There are ample amounts of suckers + carp to feed pike + walleye + ling. Yes they will eat trout but they won't do enough to damage the pop. Leave the pike alone let em get to the 35lb range as they've been caught at.